

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DELTA PILOTS ASSOCIATION,

Plaintiff,

Case No. 1:14-CV-00225-AKH

-against-

RUSSELL C. MELVIN,

Defendant.  
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X

**[PROPOSED] ORDER TO AMEND STIPULATED CONFIDENTIALITY ORDER**

**WHEREAS** Plaintiff, Delta Pilots Association (“DPA”), entered into a Stipulated Confidentiality Order with non-party Squarespace, Inc., which was so ordered by the Court on May 28, 2015 (Docket No. 47); and

**WHEREAS** Plaintiff DPA, Defendant Russell C. Melvin, and Squarespace, Inc., have agreed to amend Paragraph 3 of the Stipulated Confidentiality Order;

**IT IS HEREBY STIPULATED, AGREED AND ORDERED** that:

1. Paragraph 3 of the Stipulated Confidentiality Order (Docket No. 47), shall be replaced by the following:

3. Information produced by Squarespace in response to the Subpoena that has been marked as “Confidential” shall not be disclosed, discussed with, or used by anyone except:

(a) Attorneys of record for DPA, and the employees of such attorneys of record;

(b) Independent experts retained by DPA for the purpose of assisting DPA and its attorneys in this case;

- (c) DPA Interim President Tim Caplinger;
- (d) Attorneys of record for Defendant and the employees of such attorneys of record;
- (e) Independent experts retained by Defendant for the purpose of assisting Defendant and his attorneys in this case;
- (f) Defendant; and
- (g) This Court and its personnel.

/s/ Nicholas Paul Granath

By: Nicholas Paul Granath, Esq.  
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Date: August 1, 2018

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Date: August 7, 2018

*Courtenay O'Connor*

By: Courtenay O'Connor, Esq.  
General Counsel, Squarespace

Date: August 2, 2018

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
United States District Judge